

Message

From: Mehta, Sandeep [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=92EE749471DE4B46B322926B6E523364-MEHTA, SANDEEP]
Sent: 9/11/2019 8:40:22 PM
To: Pessetto, Jared [Pessetto.Jared@epa.gov]
Subject: FW: Vogel - Maurice Iowa Site
Attachments: 2019-05-24 Response to Comments.pdf; 2019-5-24 Vogel Paint Maurice Iowa Pilot WP.pdf; North Work Plan 5-24-2019.pdf

Jared:

If you get a chance to critically look at these documents and let me know if you see anything about point of compliance, that would help! Thanks!

Very Respectfully,
Sandeep Mehta, P.E.
Ph: (913) 551-7763
email: mehta.sandeep@epa.gov



From: Eric Smith <ESmith@ramboll.com>
Sent: Friday, May 24, 2019 3:39 PM
To: Mehta, Sandeep <mehta.sandeep@epa.gov>; Hylton Jackson <hylton.jackson@dnr.iowa.gov>
Cc: Scott.Heemstra@diamondvogel.com; 'Keith Delange' <KDelange@geotekeng.com>
Subject: RE: Vogel - Maurice Iowa Site

Sandeep

Please see attached Ramboll's, on behalf of Vogel Paint, responses to USEPA 4-29-19 comments (below), along with revised Pilot Test and North Area work plans. As a result of the addition of requested surface water sampling (Comment 4), we have also updated the QAPP accordingly (see attached). One hardcopy of the two work plans and the QAPP are also being sent to your attention.

Sincerely

Eric Smith, PG, CHG
Principal Consultant

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esmith@ramboll.com

From: Mehta, Sandeep <mehta.sandeep@epa.gov>
Sent: Monday, April 29, 2019 6:18 AM
To: Eric Smith <ESmith@ramboll.com>; Hylton Jackson <hylton.jackson@dnr.iowa.gov>

Cc: Scott.Heemstra@diamondvogel.com; 'Keith Delange' <KDelange@geotekeng.com>

Subject: RE: Vogel - Maurice Iowa Site

Eric:

Thank you for your email and patience with the EPA's review.

As you know and realize, the 2018 Annual Sampling Report was provided to the EPA for review via email dated April 1, 2019. This annual report had identified results showing some higher concentrations for COCs. The EPA wanted to review and coordinate its impact on the Pilot Test Work Plan and the North Groundwater Work Plan.

1. The EPA's comments were previously provided via IDNR email dated 10/24/2018. The EPA had requested and Vogel had modified the document to change the Pilot Test Work Plan title from being a Remedial Design to it being identified as Pilot Test. However, some locations were missed, and so I have attached the mark-up of the corrections that would be required in the Pilot Test. Please incorporate these corrections as shown in the mark-up file attached with this email and provide the corrected document for review prior to approval.
2. The 2018 Annual Sampling report shows a different or modified location for groundwater "separating point". The EPA therefore recommends modifying Pilot Study Work Plan cross-section A – A' by using boring log/well construction diagram for well GMW-1 vs. GMW-3 to illustrate the mentioned groundwater "separating point" by including the modified ethylbenzene iso-concentration contours in conjunction with the Dec. 2018 groundwater elevations. Please incorporate this modification in the corrected document for review prior to approval.
3. Figure 1 of the 2018 Annual Sampling report shows a different discharge point of the treated water by about 150 feet East-South East of GMW-13. Would this impact the need for modification to the implementation of the Pilot Study and any sampling proposed in the Pilot Study and the North Groundwater Work Plan? Please clarify why or why not, and also incorporate the reasons in the appropriate document.
4. The EPA notes the strong groundwater-surface water connection from the 2018 Annual Sampling report. Therefore, it is highly recommended that the surface water samples be also collected as part of the North Groundwater Work Plan to ensure and verify that there are no potential human health and eco-risks. Please incorporate this modification in the corrected document for review prior to approval.

Please incorporate these changes at the earliest and provide the updated document within 30 days or earlier. The EPA very much appreciates your patience with these efforts.

Very Respectfully,
Sandeep Mehta, P.E.
Ph: (913) 551-7763
email: mehta.sandeep@epa.gov



From: Eric Smith <ESmith@ramboll.com>
Sent: Friday, April 26, 2019 1:35 PM
To: Hylton Jackson <hylton.jackson@dnr.iowa.gov>; Mehta, Sandeep <mehta.sandeep@epa.gov>
Cc: Scott.Heemstra@diamondvogel.com; 'Keith Delange' <KDelange@geotekeng.com>
Subject: RE: Vogel - Maurice Iowa Site

Dear Hylton and Sandeep:

Following-up regarding the status of the review and approval of the revised work plans and QAPP submitted on March 8, 2019 (see below) associated with the Vogel Paint & Wax Co. site located in Maurice Iowa. Please indicate an anticipated date/timeframe for issuance of formal approval of the revised documents. Please contact me if you have any additional comments or questions regarding these subject documents.

I also wanted to follow up with you regarding the status of your (EPA Region 7) meeting with EPA HQ and IDNR regarding the decision documents. During our December 12, 2019 meeting, the goal was for the discussion with HQ to take place at the end of January. As the government was shut down then, it is unlikely that meeting occurred in January. However, has the meeting occurred since then? Are there plans to do so in the near future? Please let me know. We would very much like to resolve this pending issue.

Thank you for your assistance regarding these inquiries.

Eric Smith, PG, CHG
Principal Consultant

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From: Eric Smith
Sent: Friday, March 08, 2019 3:27 PM
To: Mehta, Sandeep <mehta.sandeep@epa.gov>; Hylton Jackson <hylton.jackson@dnr.iowa.gov>; 'Scott.Heemstra@diamondvogel.com' <Scott.Heemstra@diamondvogel.com>
Cc: Keith Delange <KDelange@geotekeng.com>
Subject: RE: Vogel - Maurice Iowa Site

Dear Hylton and Sandeep:

Vogel submitted a Pilot Study Work Plan, North Groundwater Work Plan, QAPP, HSP, and a response to comments document on January 28, 2019 to EPA and IDNR. EPA responded to Vogel's submission by sending a clarification request dated February 13, 2019. EPA gave Vogel until March 15, 2019 to respond.

Attached are the revised Pilot Study Work Plan, North Groundwater Work Plan, and QAPP based on the majority of EPA's clarification requests. Those changes that were not made are outlined in Vogel's responses to specific questions below.

Pilot Study Work Plan for Enhancement of Groundwater Remediation:

Vogel Response to Question 2:

- The justification to not perform the in-situ microcosm sample has been added to the Pilot Study Work Plan.

Vogel Response to Question 3:

- The Low Flow Groundwater Sampling protocol has been added to the Pilot Study Work Plan.

Vogel Response to Question 4:

- Injection volumes, locations, and procedures, including baseline monitoring activities will be addressed in the Addendum. Additionally, see Appendix B for the time line.

Work Plan for Additional Groundwater Characterization North of Former Source Area:

Vogel Response to Question 5:

- A PID to screen soil cuttings will be used during monitoring well installation. The PID specifications have been added to Table 4 and Appendix B of the QAPP. A Soil Field Screening Protocol has been added to the North Groundwater Work Plan.

Vogel Response to Question 6:

- Vogel will not be limiting the extent of the screen to 10 ft. Vogel will get as close to 10 ft. as possible, but as outlined in the North Work Plan, the extent of the screen will be determined based on site conditions (lithology, thickness of water bearing zone).

Vogel Response to Question 7:

- The text has been corrected to be consistent that the sand pack will be emplaced approximately 2 ft. above the screen throughout the document.

Vogel Response to Question 8:

- The requested information has been added to the Low Flow Groundwater Sampling Protocol and was is included in Appendix A of the QAPP.

Vogel Response to Question 9:

- The requested information has been added to the field protocols included as appendices to the work plan.

Quality Assurance Work Plan:

Vogel Response to Question 10:

- An approval page has been included in the QAPP, please provide the requested signatures and scan and email back the signature page once complete.

Vogel Response to Question 11:

- The QAPP is for the Pilot Study Work Plan and the North Groundwater Work Plan. A statement has been added to Section 1 to clarify.

Vogel Response to Question 12:

- The results from the Bio-Trap Study will be used to evaluate ranges of concentrations of dissolved oxygen, phosphorous and nitrogen that will be sufficient to stimulate and maintain bioremediation within the injection areas as part of Section 4.1.5. Decision Rules.
- The efficacy will be measured in comparison with the post injection monitoring goals as stated in Section 4.1.5. Decision Rules.

Vogel Response to Question 13:

- The Ramboll quality assurance officer (QAO) and data validation staff will be responsible for preparing the data usability report. The data usability reports will be included as an attachment or appendix to the semi-annual monitoring and progress reports. This information has been added to Section 7.4 of the QAPP.

Vogel Response to Question 14:

- Laboratory records will be retained for a minimum of five years in a secure location at the laboratory. This information has been added to Section 4.5.1 of the QAPP.

Vogel looks forward to EPA and IDNR's approval of the Pilot Study Work Plan, North Groundwater Work Plan, QAPP, and HSP so that it can move forward with their implementation as soon as possible. Thank you very much.

Eric Smith

Principal Consultant

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From: Mehta, Sandeep <mehta.sandeep@epa.gov>
Sent: Wednesday, February 13, 2019 1:56 PM
To: Hylton Jackson <hylton.jackson@dnr.iowa.gov>; 'Scott.Heemstra@diamondvogel.com' <Scott.Heemstra@diamondvogel.com>
Cc: Keith Delange <KDelange@geotekeng.com>; Eric Smith <ESmith@ramboll.com>
Subject: RE: Vogel - Maurice Iowa Site

Mr. Scott:

Thank you for the email below.

As you are aware, the federal government was shutdown and that caused a ripple effect on reviews of various documents. Typically, the review of each document, depending on its size and project complexity, has a minimum of 30 days review period.

In this instance, the EPA was able to expedite its review of the documents that were submitted via email dated 1/28/2019. But most technical staff have back logs resulting from the last shutdown, since each person also is responsible for multiple projects.

The EPA clarification comments are provided in the attached email. The EPA believes that these comments may potentially not impact the progress for the site.

Please provide Vogel Paint & Wax's response along with the updated/revised documents within 30 days of this email.

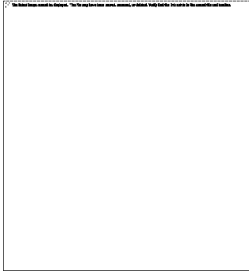
Please let me know if you have any doubts or need clarifications.

Respectfully

Sandeep Mehta, P.E.

Ph: (913) 551-7763

Email: Mehta.sandeep@epa.gov



From: Eric Smith <ESmith@ramboll.com>
Sent: Tuesday, February 12, 2019 11:08 AM
To: Mehta, Sandeep <mehta.sandeep@epa.gov>; Hylton Jackson <hylton.jackson@dnr.iowa.gov>
Cc: 'Scott.Heemstra@diamondvogel.com' <Scott.Heemstra@diamondvogel.com>
Subject: RE: Vogel - Maurice Iowa Site

Sandeep and Hylton:

In light of the potential federal government shutdown beginning this Friday (February 15, 2019), I am writing to follow up with you regarding Vogel's submission on January 28, 2019 of the Pilot Study Work Plan, Response to Comments document, Northern Groundwater Plan, QAPP, and HASP. What is the status of EPA and IDNR's review? Does EPA and/or IDNR have any questions? Also, does EPA or IDNR have a status update regarding the conference call between EPA HQ, EPA Region 7, and IDNR regarding the decision documents? Insight would be greatly appreciated.

Additionally, I wanted to give EPA and IDNR an update on the status of the Bio-Trap study. Barring any setbacks due to weather, the plan is to begin the Bio-Trap study during the first week of March 2019.

Sincerely,

Eric Smith
Principal Consultant

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From: Eric Smith
Sent: Monday, January 28, 2019 3:10 PM
To: Mehta, Sandeep <mehta.sandeep@epa.gov>; Jackson, Hylton <hylton.jackson@dnr.iowa.gov>
Cc: Scott.Heemstra@diamondvogel.com; Keith Delange <KDelange@geotekeng.com>
Subject: Vogel - Maurice Iowa Site

Sandeep and Hylton:

Ramboll U.S. Corporation (Ramboll), on behalf of Vogel Paint and Wax Company, Inc. (Vogel), is submitting the following documents to the United States Environmental Protection Agency – Region 7 (USEPA) and the Iowa Department of Natural Resources (IDNR) in response to USEPA's December 28, 2018 follow-up comments letter regarding the Vogel site located at Grant Avenue Between 490th and 500th street in the City of Maurice, Sioux County, Iowa ("the Site"):

- **RESPONSE TO FOLLOW-UP COMMENTS DOCUMENT DATED JANUARY 28, 2018;**
- Pilot Study Work Plan for Enhancement of Groundwater Remediation (revised from *Remedial Action Work Plan for Groundwater Remediation*, 8-13-18);
- **QUALITY ASSURANCE PROJECT PLAN (QAPP); AND**
- Health and Safety Plan (HASP).

In addition, Ramboll is also submitting a revised *Work Plan for Additional Groundwater Characterization North of Former Source Area* that addresses September 11, 2018 USEPA comments regarding this prior work plan dated August 13, 2018.

Please indicate if hard copies of any of these documents is required.

USEPA's December 28, 2018 follow-up comments document included an outline of the discussion between Vogel and USEPA regarding the need for decision documents. Vogel would like to make some clarifications to what was outlined by USEPA because Vogel's position was not fully discussed. It is Vogel's contention that neither an ESD nor a ROD amendment is necessary to delist the site from the NPL upon completion of the Pilot Study. This is because: 1) the goal of the Pilot Study is for Vogel to meet the MCL's currently required in the 2003 ESD, 2) bioremediation was originally contemplated as an alternative remedy in the original 1989 ROD, and as such, the public would have reasonably anticipated its use at the site, and 3) IDNR has the authority to allow Vogel to turn off the pump-and-treat system if Vogel can show that there is no significant threat to human health and the environment, which Vogel believes it can show (Article VI, subsection 6(a) of the Consent Order).

Vogel's alternative argument is that if EPA is unwilling to delist the site from the NPL without updating the decision documents, only an ESD would be necessary. This alternative argument was discussed in detail during the December 12, 2018 in-person meeting. This alternative argument was the only argument that was included in USEPA's outline of the decision document discussion.

Vogel understands that IDNR and USEPA (Region 7) will be meeting with EPA headquarters to discuss whether new decision documents are necessary to delist Vogel's site upon completion of the Pilot Study. Please update us on the status of this discussion.

Sincerely,

Eric Smith

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